

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed December 24, 2003. Claims 1-30 were pending in the Application. Claims 1-30 stand rejected. Applicants amend Claims 1, 8, 14, 21, and 26. Applicants respectfully request reconsideration and favorable action in this case.

Claim Rejections – 35 U.S.C. §102

The Examiner rejects Claims 1-30 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,137,791 issued to Frid, et al. ("*Frid*"). Applicants respectfully traverse this rejection and submit that *Frid* does not describe, expressly or inherently, each and every limitation of the rejected claims. As amended, Claim 1 recites:

A method for supporting data communications comprising:
receiving a device identifier from a mobile unit;
determining a home agent for the mobile unit based on the device identifier;
requesting subscription information from the home agent in advance of the mobile unit roaming into a foreign network associated with a foreign agent, wherein the subscription information comprises an internet protocol (IP) address for the mobile unit; and
initiating registration of the foreign agent with the home agent, wherein the registration permits the foreign agent to receive redirect packets from the home agent, the redirect packets containing information for communication to the mobile unit.

As indicated above, *Frid* does not disclose, expressly or inherently, every element of Claim 1. *Frid* discloses a mobile communication system "enabling a mobile station associated with a first packet data network to roam within a second packet network where the data routing mechanisms utilized by the first and second packet data networks are incompatible." As *Frid* indicates, "[t]he mobile station 20 realizes that it has traveled into a new geographic area being covered by a new visited mobile switching center (VMSC) 40 and performs a registration." Col. 4, ll. 32-36. *Frid* does not disclose "requesting subscription information from the home agent in advance of the mobile unit roaming into a foreign network associated with a foreign agent" as recited by amended Claim 1.

As a result, *Frid* does not disclose, expressly or inherently, every element of Claim 1. Claim 1 is thus allowable for at least this reason. Applicants respectfully request reconsideration and allowance of Claim 1 and its dependents.

Furthermore, several dependents of Claim 1 include additional elements that are not disclosed, expressly or inherently, by *Frid*. For example, Claim 2 recites:

The method of Claim 1, further comprising receiving the redirect packets in advance of establishing a data-link layer connection with the mobile unit to support a substantially seamless handoff of a data communications session of the mobile unit.

Frid fails to disclose performing any form of seamless handoff. Thus, *Frid* does not disclose “receiving the direct packets in advance of establishing a data-link layer connection with the mobile unit to support a substantially seamless handoff of a data communications session of the mobile unit” as recited by Claim 2. Applicants respectfully note that the Examiner fails to address this element in rejecting the claim.

As a result, *Frid* does not disclose, inherently or expressly, at least this additional element of Claim 2. Claim 2 is allowable for at least this additional reason. As indicated above, Applicants request reconsideration and allowance of Claim 2.

Although of differing scope from Claim 1, amended Claims 8, 14, 21, and 26 include elements that, for reasons substantially similar to those discussed above with respect to Claim 1, are not disclosed, expressly or inherently, by *Frid*. Thus, Claims 8, 14, 21, and 26 are allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claims 8, 14, 21, and 26, and their respective dependents.

Conclusion

Applicants have made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Although no fees are believed to be currently due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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